

Exhibit CC

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED]
IN SUPPORT OF RESPONSE TO
FOLLOW-UP QUESTIONS RE DIXIE
AND FLY FIRES, QUESTIONS 7
THROUGH 36**

Judge: Hon. William Alsup

1 I, [REDACTED], hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge and if called as a witness I
3 could and would testify competently to the matters set forth herein.

4 2. I am the Senior Manager of the Distribution Planning Group at Pacific Gas and
5 Electric Company ("PG&E").

6 3. In the course of my duties at PG&E, I have become familiar with the operation of
7 the line reclosers used by the company, and the electronic data they transmit and store. I also have
8 become familiar with the storage of data transmitted by the line reclosers used by the company in
9 its PI Historian database. I further have become familiar with the fuses used by the company on
10 its electric distribution system.

11 4. Line reclosers transmit to the company's RT SCADA system a variety of data at
12 periodic intervals of between approximately 15 and 30 seconds. If the data read at any particular
13 time interval differs from the data read at the immediately preceding time interval, the data point is
14 recorded in the company's PI Historian database. This includes the data point regarding the
15 current level on each phase of the distribution circuit on which the line recloser operates.

16 5. Attachment 1 hereto is a true and correct copy of the PI Historian data for the
17 current level on each of the three phases of the Bucks Creek 1101 Line for July 13, 2021.

18 6. Fuse 17733 is identified in the company's Electrical Distribution GIS database as a
19 10 amp power fuse with a with PT63 Polymer cutout.

20 7. I have reviewed that photo attached hereto as Attachment 2 which I am informed is
21 from a May 13, 2021 overhead inspection of Fuse 17733. The fuses in the photo appear to me to
22 be S&C SMU-20 power fuses.


23 8. I have reviewed the oscillography data set forth in paragraphs 13-16 of the July 21,
24 2021 declaration of [REDACTED], a declaration that I am informed was filed with the Court on
25 July 28, 2021 as Dkt. No. 1408-4. I also have reviewed the time characteristic curve for an S&C
26 SMU-20 10 amp fuse, that was provided to me by [REDACTED], a true and correct copy of
27

1 which is attached hereto as Attachment 3. Based on this data, the termination in less than 4/100ths
2 of a second of the line-to-line fault event recorded by the recloser at approximately 6:48 a.m. on
3 July 13, 2021, is consistent with the proper operation of the fuses.

4 //

1 I declare under penalty of perjury under the laws of the United States and the State of
2 California that the foregoing is true and correct to the best of my knowledge.

3 Executed this 30th day of August, 2021, in the City of Folsom, County of Sacramento,
4 State of California.



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Attachment 1

Amps A		Amps B		Amps C	
7/12/21 20:39	2.5	7/12/21 17:08	3.3	7/12/21 23:55	2.3
7/13/21 6:48	1.2	7/13/21 4:35	4.6	7/13/21 0:05	1.2
7/13/21 7:44	2.3	7/13/21 4:35	3.5	7/13/21 0:29	2.3
7/13/21 7:45	1.2	7/13/21 6:19	2.4	7/13/21 0:39	1.2
7/13/21 8:15	2.3	7/13/21 6:28	3.5	7/13/21 1:03	2.3
7/13/21 8:19	1.1	7/13/21 6:48	1.1	7/13/21 1:04	1.2
7/13/21 8:35	2.3	7/13/21 7:54	2.3	7/13/21 2:23	2.3
7/13/21 8:39	1.2	7/13/21 8:01	1.2	7/13/21 2:23	1.2
7/13/21 8:47	2.3	7/13/21 8:21	2.3	7/13/21 2:32	2.3
7/13/21 8:47	1.2	7/13/21 8:46	1.2	7/13/21 2:33	1.2
7/13/21 8:52	2.3	7/13/21 8:49	2.3	7/13/21 3:03	2.3
7/13/21 9:09	1.2	7/13/21 9:09	1.2	7/13/21 3:04	1.2
7/13/21 9:18	2.4	7/13/21 9:18	2.3	7/13/21 3:10	2.3
7/13/21 9:20	1.2	7/13/21 9:31	1.2	7/13/21 3:10	1.2
7/13/21 9:25	2.4	7/13/21 9:46	2.3	7/13/21 3:26	2.3
7/13/21 9:25	1.2	7/13/21 10:00	1.2	7/13/21 3:33	1.2
7/13/21 9:49	2.5	7/13/21 10:05	2.3	7/13/21 4:35	2.4
7/13/21 9:50	1.2	7/13/21 10:26	1.2	7/13/21 4:35	1.2
7/13/21 10:10	2.3	7/13/21 10:40	2.3	7/13/21 5:03	2.3
7/13/21 10:23	1.2	7/13/21 11:05	1.2	7/13/21 5:04	1.2
7/13/21 11:28	2.4	7/13/21 11:08	2.3	7/13/21 5:08	2.3
7/13/21 11:32	1.2	7/13/21 11:22	1.2	7/13/21 5:08	1.2
7/13/21 11:51	2.3	7/13/21 11:28	2.3	7/13/21 5:09	2.3
7/13/21 12:00	1.2	7/13/21 11:31	1.2	7/13/21 5:09	1.2
7/13/21 12:21	2.3	7/13/21 11:32	2.3	7/13/21 5:55	2.3
7/13/21 12:21	1.2	7/13/21 11:34	1.2	7/13/21 6:48	1.1
7/13/21 13:04	2.3	7/13/21 11:35	2.4		
7/13/21 13:05	1.2	7/13/21 11:50	1.2		
7/13/21 14:18	2.3	7/13/21 11:54	2.3		
7/13/21 14:21	1.2	7/13/21 12:21	1.2		
7/13/21 14:47	2.3	7/13/21 12:30	2.3		
7/13/21 14:51	1.2	7/13/21 12:50	1.2		
7/13/21 15:06	2.4	7/13/21 12:50	2.3		
7/13/21 15:09	1.2	7/13/21 12:51	1.2		
7/13/21 15:21	2.3	7/13/21 12:58	2.3		
7/13/21 15:22	1.2	7/13/21 13:15	1.2		
7/13/21 15:22	2.3	7/13/21 13:20	2.3		
7/13/21 15:28	1.2	7/13/21 13:44	1.2		
7/13/21 15:45	2.5	7/13/21 13:49	2.3		
7/13/21 15:46	1.2	7/13/21 13:51	1.2		
7/13/21 16:09	2.3	7/13/21 13:54	2.3		
7/13/21 16:12	1.2	7/13/21 14:47	1.2		
7/13/21 16:43	2.3	7/13/21 14:47	2.3		
7/13/21 16:43	1.2	7/13/21 14:48	1.2		
7/13/21 17:12	2.3	7/13/21 14:52	2.3		
7/13/21 17:12	1.2	7/13/21 15:12	1.2		

Amps A		Amps B		Amps C
7/13/21 18:09	2.3	7/13/21 15:16	2.3	
7/13/21 18:09	1.2	7/13/21 15:37	1.2	
		7/13/21 15:45	2.3	
		7/13/21 15:48	1.2	
		7/13/21 15:56	2.4	
		7/13/21 16:08	1.2	
		7/13/21 16:19	2.4	
		7/13/21 16:36	1.2	
		7/13/21 17:21	2.4	
		7/13/21 17:22	1.2	
		7/13/21 18:54	2.3	
		7/13/21 18:55	1.2	

Attachment 2



Attachment 3

